



*CERTIFIED MAIL 7017 2620 0000 5391 0210  
RETURN RECEIPT REQUESTED*

January 30, 2019

U.S. EPA Region 8  
1595 Wynkoop Street, 8ENF-AT  
Denver, CO 80202-1129

**RECEIVED**

**FEB 5 - 2019**

**Office of Enforcement, Compliance  
and Environmental Justice**

**BEAR CREEK GAS PLANT  
PERMIT TO CONSTRUCT NO. PTC15067 ISSUED 11/13/2015  
SEMIANNUAL NSPS SUBPARTS OOOO AND OOOOa LDAR MONITORING REPORT**

ONEOK Rockies Midstream, L.L.C. (ORM) submits the attached Semiannual New Source Performance Standards (NSPS), Subparts OOOO and OOOOa, Leak Detection and Repair (LDAR), Monitoring Report for the Bear Creek Gas Plant located in Dunn County, North Dakota. This report is submitted for monitoring conducted during the period from **July 1, 2018** through **December 31, 2018**.

Please call Victoria Danzeisen at (701) 207-0020 or me at (918) 591-5009 if you have any questions regarding this report.

Sincerely,

(b) (6)

W. Parke Moore  
Corporate LDAR Program Manager

Attachments: Bear Creek Gas Plant – Semiannual LDAR Monitoring Report

cc: Jim Semerad  
North Dakota Department of Environmental Quality  
Division of Air Quality  
918 E Divide, 2<sup>nd</sup> Floor  
Bismarck, ND 58501-1947

*CERTIFIED MAIL 7017 2620 0000 5391 0227, RETURN RECEIPT REQUESTED*

K Rudningen / V Danzeisen / A Hancock / C Fonck / C Forsander / R Brown / (.pdf)  
Tulsa Environmental Files – Bear Creek - ND\2.0 Air Files\2.3 Compliance Reporting\LDAR SAR\2019-1\SUBMITTAL

**CERTIFICATION**  
**FOR**  
**SEMIANNUAL LDAR MONITORING REPORT**  
**NSPS SUBPARTS 0000 and 0000a**  
**JULY 1, 2018 through DECEMBER 31, 2018**

**Facility Name:** Bear Creek Gas Plant

**Facility Permit No.:** Construction Permit PTC15067 dated 11/13/2015

**Facility Location:** NE/4, Sec. 28, T146N, R95W, Dunn County, North Dakota

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

**Name of Responsible Official (print or type):** Craig A. Forsander

**Title:** Vice President – ORM Operations

**Signature:**

(b) (6)

**Date:**

January 28, 2019

**ONEOK Rockies Midstream, L.L.C.  
Bear Creek Gas Plant  
Dunn County, North Dakota**

***SEMIANNUAL LDAR MONITORING REPORT  
NSPS SUBPARTS 0000 and 0000a  
JULY 1, 2018 through DECEMBER 31, 2018***



January 11, 2019

Ms. Victoria Danzeisen  
Environmental Specialist  
ONEOK Rockies Midstream  
896 25<sup>th</sup> Street SE  
Sidney, MT 59270

RE: Semiannual Leak Detection and Repair (LDAR) Monitoring Report, Bear Creek Natural Gas Processing Facility, Dunn County, North Dakota

Dear Ms. Danzeisen:

During July 1, 2018 through December 31, 2018, Trihydro Corporation (Trihydro) completed routine monthly monitoring for fugitive emissions as required by the LDAR program at the ONEOK Rockies Midstream Bear Creek (Bear Creek) natural gas processing facility located in Dunn County, North Dakota. Monitoring activities were completed to satisfy the requirements of the New Source Performance Standard (NSPS) Subpart OOOO and Subpart OOOOa regulations. This report serves as the documentation required for submittal to the regulatory agencies for the July through December 2018 monitoring period.

#### **NSPS Subpart OOOO and OOOOa Requirements**

NSPS Subpart OOOO and OOOOa requires that a semiannual report be submitted for each process unit and month within the reporting period. The semiannual report must include:

- The number of valves, pressure relief devices (PRDs), pumps, compressors, and connectors for which leaks were detected.
- The number of valves, PRDs, pumps, compressors, and connectors for which leaks were not repaired as required or placed on the delay of repair (DOR) list.
- The facility is required to report the reasons for each DOR and the dates of process unit shutdowns that occurred within the reporting period.
- Revisions to the component inventory.

#### **Results**

The Bear Creek facility consists of six process units subject to the Subpart OOOO regulation and one process unit subject to Subpart OOOOa. Trihydro personnel monitored components in volatile organic



Ms. Victoria Danzeisen  
January 11, 2019  
Page 2

compound service and wet gas service, in accordance with United States Environmental Protection Agency Method 21 protocol.

During the July 1, 2018 through December 31, 2018 reporting period, 11 leaks were detected from components monitored as required by the Subpart OOOO regulation. There were 19 leaks detected from components monitored as required by the Subpart OOOOa regulation. Initial repairs were completed on each component identified as leaking and received a passing Method 21 inspection within the 15-day repair deadline. The number of valves, pumps, PRDs, compressors, and connectors for which leaks were detected during the reporting period are included in Attachments A and B.

There were 10 components added to and 6 components deleted from Subpart OOOO process unit inventories during the reporting period. There were 47 components added to and 5 components deleted from Subpart OOOOa process unit inventory during the reporting period. Revisions to the component inventory are reported in Attachment A.

No process unit shutdowns meeting the definition of §60.481 were reported by the facility during the reporting period.

If you have any questions or comments, please contact Kyle Haag at [khaag@trihydro.com](mailto:khaag@trihydro.com) or Jeremy Sell at [jsell@trihydro.com](mailto:jsell@trihydro.com) or by calling us at (701) 204-0065.

Sincerely,  
Trihydro Corporation

(b) (6)

Kyle Haag  
Project Manager

07M-038-003

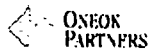
Attachments

(b) (6)

Jeremy Sell  
Business Unit Manager – LDAR Services

**ATTACHMENT A**

**EQUIPMENT LEAK REPORT,  
DELAY OF REPAIR COMPONENTS, AND  
REVISIONS TO THE PRIOR INVENTORY**



# Semi-Annual Report

From: 7/1/2018 To: 12/31/2018, Rule: NSPS - OOOO

ONEOK - Bear Creek

Unit: FLARE CONVEYANCE SYSTEM (CLVS)

Count:	Valves:	33	Pumps:	2	Compressors:	0	PRVs:	7	Connectors:	47
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired In Repair Period:	Leaking:	Not Repaired In Repair Period:	Leaking:	Not Repaired In Repair Period:	Leaking:	Not Repaired In Repair Period:	Leaking:	Not Repaired In Repair Period:
Jul 2018	0	0	0	0	0	0	0	0	0	0
Aug 2018	0	0	0	0	0	0	0	0	0	0
Sep 2018	0	0	0	0	0	0	0	0	0	0
Oct 2018	0	0	0	0	0	0	0	0	0	0
Nov 2018	0	0	0	0	0	0	0	0	0	0
Dec 2018	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2018 To: 12/31/2018, Rule: NSPS - OOOO

ONEOK - Bear Creek

Unit: METHANOL

Count:	Valves: 72		Pumps: 2		Compressors: 0		PRVs: 3		Connectors: 286	
# Added:	0		0		0		0		0	
# Removed:	0		0		0		0		0	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2018	0	0	0	0	0	0	0	0	2	0
Aug 2018	0	0	0	0	0	0	0	0	0	0
Sep 2018	0	0	0	0	0	0	0	0	0	0
Oct 2018	0	0	0	0	0	0	0	0	0	0
Nov 2018	0	0	0	0	0	0	0	0	0	0
Dec 2018	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs..



# Semi-Annual Report

From: 7/1/2018 To: 12/31/2018, Rule: NSPS - OOOO

ONEOK - Bear Creek

Unit:

NGL METERING SKID

Count:	Valves:	132	Pumps:	0	Compressors:	0	PRVs:	0	Connectors:	457
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2018	0	0	0	0	0	0	0	0	0	0
Aug 2018	0	0	0	0	0	0	0	0	0	0
Sep 2018	0	0	0	0	0	0	0	0	0	0
Oct 2018	0	0	0	0	0	0	0	0	0	0
Nov 2018	0	0	0	0	0	0	0	0	0	0
Dec 2018	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2018 To: 12/31/2018, Rule: NSPS - 0000

ONEOK - Bear Creek

Unit:

PROCESSING AND PRODUCT TRANSFER

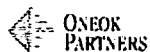
Count:	Valves: 858		Pumps: 7		Compressors: 4		PRVs: 19		Connectors: 7583	
# Added:	0		0		0		0		0	
# Removed:	0		0		0		0		0	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2018	0	0	1	0	0	0	0	0	0	0
Aug 2018	4	0	0	0	0	0	0	0	0	0
Sep 2018	0	0	0	0	0	0	0	0	0	0
Oct 2018	1	0	0	0	0	0	0	0	0	0
Nov 2018	2	0	0	0	0	0	0	0	0	0
Dec 2018	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2018 To: 12/31/2018, Rule: NSPS - OOOO

ONEOK - Bear Creek

Unit: TREATING

Count:	Valves: 182		Pumps: 0		Compressors: 1		PRVs: 9		Connectors: 947	
# Added:	0		0		0		0		0	
# Removed:	0		0		0		0		0	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2018	0	0	0	0	0	0	0	0	0	0
Aug 2018	0	0	0	0	0	0	0	0	0	0
Sep 2018	0	0	0	0	0	0	0	0	0	0
Oct 2018	0	0	0	0	0	0	0	0	0	0
Nov 2018	0	0	0	0	0	0	0	0	0	0
Dec 2018	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2018 To: 12/31/2018, Rule: NSPS - OOOO

ONEOK - Bear Creek

Unit:

VOL STORAGE AND LOADING

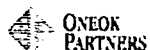
Count:	Valves: 332		Pumps: 5		Compressors: 0		PRVs: 3		Connectors: 653	
# Added:	1		0		0		0		9	
# Removed:	0		0		0		0		6	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2018	1	0	0	0	0	0	0	0	0	0
Aug 2018	0	0	0	0	0	0	0	0	0	0
Sep 2018	0	0	0	0	0	0	0	0	0	0
Oct 2018	0	0	0	0	0	0	0	0	0	0
Nov 2018	0	0	0	0	0	0	0	0	0	0
Dec 2018	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2018 To: 12/31/2018, Rule: NSPS - OOOOa

ONEOK - Bear Creek

Unit: INLET RECEIVING

Count:	Valves: 1911		Pumps: 7		Compressors: 8		PRVs: 44		Connectors: 9057	
# Added:	12		0		1		0		34	
# Removed:	5		0		0		0		0	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2018	0	0	0	0	0	0	0	0	1	0
Aug 2018	0	0	0	0	0	0	0	0	15	0
Sep 2018	2	0	0	0	0	0	0	0	1	0
Oct 2018	0	0	0	0	0	0	0	0	0	0
Nov 2018	0	0	0	0	0	0	0	0	0	0
Dec 2018	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.

**ATTACHMENT B**  
**EPA CDX REPORTING TABLE**

An owner or operator must include the information specified in paragraphs (c)(1) and (2) of this section in all semiannual reports in addition to the information required in §60.487a(c)(2)(i) through (vi): (1) Number of pressure relief devices for which leaks were detected as required in §60.5401a(b)(2); and (2) Number of pressure relief devices for which leaks were not repaired as required in §60.5401a(b)(3).

The asterisk (\*) next to each field indicates that the corresponding field is required.

EQUIPMENT INFORMATION

Facility Record No. * (Select from dropdown list)	Month Identification * (Select from dropdown list)	Number of pressure relief devices for which leaks were detected * (§60.5422a(c)(1))	Number of pressure relief devices for which leaks were not repaired * (§60.5422a(c)(2))	Number of valves for which leaks were detected * (§60.487a(c)(2)(i))	Number of valves for which leaks were not repaired * (§60.487a(c)(2)(ii))	Number of pumps for which leaks were detected * (§60.487a(c)(2)(iii))	Number of pumps for which leaks were not repaired * (§60.487a(c)(2)(iv))	Number of connectors for which leaks were detected * (§60.487a(c)(2)(v) i), §60.5422a(a))	Number of connectors for which leaks were not repaired * (§60.487a(c)(2)(viii), §60.5422a(a))
		e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5
	1 July	0	0	0	0	0	0	1	0
	1 August	0	0	0	0	0	0	15	0
	1 September	0	0	2	0	0	0	1	0
	1 October	0	0	0	0	0	0	0	0
	1 November	0	0	0	0	0	0	0	0
	1 December	0	0	0	0	0	0	0	0